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FILED
IN COUNTY CLERK'S OFFICE
PIERCE COUNTY, WASHINGTON
A.M. DEC 3 - 2002 P.M.
BOB SAN SOUCIE
COUNTY CLERK
BY _____ DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE

JOSEPH J. KIRBY and DEBORAH A.
KIRBY, husband and wife,

Plaintiffs,

v.

THE CITY OF TACOMA, a municipal
corporation; RAY CORPUZ and "JANE
DOE" CORPUZ, husband and wife;
PHILIP ARREOLA and "JANE DOE"
ARREOLA, husband and wife; WILLIAM
WOODARD and CATHERINE
WOODARD, husband and wife;
RAYMOND ROBERTS and "JANE DOE"
ROBERTS, husband and wife; DAVID
BRAME and "JANE DOE" BRAME,
husband and wife; and JAMES
HAIRSTON and "JANE DOE"
HAIRSTON, husband and wife,

Defendants.

No. 99-2-13911-4

DECLARATION OF WILLIAM
WOODARD IN SUPPORT OF
DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT
REGARDING PLAINTIFF'S
DISABILITY DISCRIMINATION
CLAIM

NOTED FOR:
January 3, 2003

ASSIGNED:
Judge Katherine M. Stolz

ORIGINAL

1 STATE OF WASHINGTON)
 2 COUNTY OF PIERCE) ss.
)

3 I, WILLIAM WOODARD, hereby declare the following is true under
 4 penalty of perjury under the laws of the State of Washington.

5 1. That I am over the age of eighteen and competent to testify herein.

6 2. That I was an Assistant Chief with the Tacoma Police Department
 7 from January 19, 1998 through October 13, 1999.

8 3. That during a staff meeting on June 15, 1998, consisting of
 9 Investigative Bureau managers, a discussion occurred about a potential
 10 ongoing domestic violence situation involving two Tacoma Police investigative
 11 personnel.
 12

13 4. That select individuals at the meeting volunteered additional
 14 information regarding contacts initiated by the involved officers over the
 15 weekend.

16 5. That one of the individuals to volunteer information was Lt. Kirby.

17 6. That Lt. Kirby provided information to the group relative to a
 18 phone conversation that he had over the weekend with one of the officer's.
 19

20 7. Following the oral presentations, at the close of the meeting, I
 21 asked those who had provided information about the domestic violence
 22 situation to document that information in an administrative report.

23 8. That at that point, Lt. Kirby vehemently stated flatly that he would
 24 not provide a report, indicating that his communication with the officer was a
 25 personal conversation away from work.
 26

